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FCC Mail Room

February 25, 2010

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

RE: CPNI Certifications for 2009  
EB Docket No.: 06-36

Dear Ms. Dortch:

Enclosed, please find certifications of compliance with the FCC's CPNI rules as required under 47 C.F.R. § 64.2009(e) for the following affiliated companies:

Hargray Telephone Company, Inc.  
Bluffton Telephone Company, Inc.  
Hargray, Inc.  
Hargray of Georgia, Inc.  
Low Country Carriers, LLC d/b/a Hargray Long Distance Company  
Hargray Communications Group, Inc.

All inquiries regarding the attached certifications should be directed to my attention at (843) 686-1210.

Sincerely, -

Aubrey E. Judy III  
Director, Regulatory & Carrier Relations  
Hargray

cc: Best Copy and Printing, Inc.

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List ABCDE

**Annual 47 C.F.R. S: 64.2009(e) CPNI Certification for 2009****FEB 26 2010*****EB Docket 06-36***

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Company / Filer ID:

Hargray Telephone Company, Inc. / 803625

Bluffton Telephone Company, Inc. / 806109

Hargray, Inc. / 821672

Low Country Carriers, LLC d/b/a Hargray Long Distance Company / 801399

Hargray of Georgia, Inc. / 822722

Hargray Communications Group, Inc. / 827444

Name of signatory: Andrew J. Rein

Title of signatory: VP &amp; General Manager, Residential

I, Andrew J. Rein, certify that I am an officer of Hargray Communications Group, Inc., Hargray Telephone Company, Inc., Bluffton Telephone Company, Inc., Hargray, Inc., Hargray of Georgia, Inc., and Low Country Carriers, LLC d/b/a Hargray Long Distance Company (collectively and individually "Hargray") and acting as an agent of Hargray, that I have personal knowledge that Hargray has established operating procedures that are adequate to ensure compliance with the rules of the Federal Communications Commission regarding the protection of customer proprietary network information ("CPNI"). See 47 C.F.R. S: 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how Hargray's procedures ensure that Hargray is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules. Hargray did not take any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in 2009. The Company is not aware of any attempts by pretexters to access the CPNI of Company customers and thus has not had to take any actions against data brokers. The Company has taken steps to protect CPNI from unauthorized access and has described these steps in the accompanying statement.

Hargray has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

I hereby certify that the statements contained within this certification and the accompanying statement are accurate, complete and in accordance with Commission rules.

Signed Date Filed February 25, 2010

Attachment

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STATEMENT

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Hargray Telephone Company, Inc., Bluffton Telephone Company, Inc., Hargray, Inc., Hargray of Georgia, and Low Country Carriers, LLC d/b/a Hargray Long Distance Company and Hargray Communications Group, Inc. (collectively and individually "Hargray") has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI").

- Hargray has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
  - Hargray sends out an annual opt out notice to its customers as well as a notice to all new customers. This notice is compliant with 64.2008 of the Commission's rules and is maintained for at least one year.
  - Hargray maintains an electronic record of the response to these notices for use in determining allowable and non-allowable uses of CPNI. The data is stored in the customer record that appears every time a customer service representative accesses a customer's account.
- Hargray continually educates and trains its employees regarding the appropriate use of CPNI. Hargray has established disciplinary procedures should an employee violate the CPNI procedures established by Hargray.
  - Hargray has specifically trained all employees that have access to CPNI and provided optional training for all employees. Hargray is also creating a training program for new employees regardless of their ability to access CPNI. Both training programs indicate disciplinary actions for improper access to and use of CPNI up to and including dismissal.
- Hargray maintains a record of its and its affiliates' sales and marketing campaigns that use its customers' CPNI. Hargray also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. Hargray does not share CPNI with third parties except upon affirmative written request by the customer. Any instances where Hargray uses third parties as part of its marketing efforts, data shared will not include CPNI.
- Hargray has established a supervisory review process regarding compliance with the CPNI rules with respect to outbound marketing situations and maintains records of compliance for a minimum period of one year. Specifically, Hargray's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.

- Hargray has implemented procedures or confirmed existing procedures for compliance with new Section 64.2010 including, but not limited to the following:
  - Authentication of customers before disclosing CPNI on customer-initiated telephone contacts or business office visits. Hargray maintained its existing procedures for authentication of customers for routine activity such as reviewing services provided, questioning specific charges, or adding and removing specific services. In the unusual instance where the customer requests call detail information, we provide that data over the phone only if the customer has a PIN established. If a PIN has not been established or if the customer cannot remember his/her PIN, Hargray calls the customer back at the designated number, requests that the customer visit the business office and provide photo identification, or mails the information to the address of record. On customer-initiated telephone contacts or business office visits, Hargray does not allow hint questions based on readily available biographical information or account information.
  - Hargray provides customers with on-line access to customer account information only through the use of a password. For on-line access, Hargray does not allow hint questions based on readily available biographical information or account information to access call detail information. .
  - Hargray has implemented procedures to provide immediate notification to customers of account changes, including changes in address-of-record and passwords and attempts at access to CPNI through use of back-up methods due to forgotten passwords.
- Pursuant to Section 64.2009, Hargray makes the following explanation of any actions taken against data brokers and a summary of all customer complaints received in the past year concerning the unauthorized release of CPNI:

Not applicable.      No actions taken against data-brokers.  
                                  No customer complaints received.

- Hargray has adopted procedures to comply with Section 64.2011 for notifying law enforcement of CPNI security breaches, together with related recordkeeping and deferred notification to customers.